

College Athlete NIL Litigation
Case No. 4:20-cv-03919

April 15, 2025

Re: Proposed Roster Limits

The Honorable Claudia Wilken;

I am writing you to advocate for the prudent measure of phasing in roster limits rather than fully implementing them in the Fall of 2025. While college coaches have been taking measures to adjust their rosters for the pending change, many have paused in order to avoid further unnecessary disruption of lives awaiting a final decision from the House vs. NCAA Settlement. Please consider the following in rendering your decision:

- William & Mary has delayed opt-in of the proposed settlement until 2026.
- Indiana State University will not opt-in in 2025 and will reassess in 2026.
- Implementation of this plan does not consider the **college admissions process** or **recruiting timelines**. Most college applications opened August 1, 2024 for the class of 2025, so we are well beyond the application, scholarship, housing, and financial aid window for students enrolling in the Fall of 2025. Applications have closed, scholarships and financial aid have been allocated. The most vulnerable class of athletes to be cut due to roster limits are these as they tend to be inexperienced/underdeveloped in comparison to upperclassman transfers and international players. These players are the most at risk and impact over 10,000 student-athletes across multiple sports, that would have to restart their college applications for the 2026 cycle. In terms of recruiting, women's soccer programs will begin committing 2027 players as early as June 15, 2025 and most D1 programs are done with their 2026 recruiting class. Immediate implementation of roster limits for Fall 2025, would leave a 2025 D1 recruit with very little options resulting in the end of their sporting experience at this level. For these reasons a thoughtful phase in implementation is warranted.
- The NCAA plans to implement **5 in 5 policy** this summer which would give current juniors and beyond an extra year of eligibility. This further complicates the immediate implementation of roster limits for Fall 2025. Inevitably this will result in further student-athlete cuts due to roster size limitations.
- The impact of instituting immediate roster limits in the Fall of 2025 this late in the cycle will have a devastating effect on families financially due to loss of scholarship, financial aid, broken housing leases, lost school deposits, application fees, etc. It will also further compound the mental anguish of all parties concerned: athletes, families, coaches.

In the words of the NCAA, "It's Too Complicated" to not thoughtfully implement a phase in as people's lives are being materially disrupted from these decisions without representation.

Thoughtfully,
Wendy Dunn
North Carolina